

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SOURCE VAGABOND SYSTEMS, LTD.,

Plaintiff,

-against-

HYDRAPAK, INC.,

Defendant.

Case No.: 11 CIV 5379-CM-JLC

ECF CASE

FILED ELECTRONICALLY

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**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

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**PLEASE TAKE NOTICE THAT** upon the accompanying Memorandum of Law, the Rule 56.1 Statement of Undisputed Facts, the Declarations of Eric S. Walters and Matthew J. Lyon and all exhibits attached thereto, any reply brief(s) and/or oral argument, and all prior proceedings had herein, Defendant Hydrapak, Inc., by its attorneys, hereby moves the Court, before the Honorable Colleen McMahon, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an order granting Defendant Hydrapak, Inc. summary judgment of non-infringement of U.S. Patent No. 7,648,276 against Plaintiff Source Vagabond Systems, Ltd. pursuant to Rule 56 of the Federal Rules of Civil Procedure, together with such further relief as this Court deems proper.

Dated: November 1, 2011

Respectfully submitted,

MORRISON & FOERSTER LLP

By: /s/ Eric S. Walters

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